

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ALCOA, INC.,)
)
)
Plaintiff,)
)
v.) C.A. No. 06-383-SLR
)
)
ALCAN INC., a Canadian corporation, ALCAN)
CORP., a Texas corporation, ALCAN CORP., a)
Delaware corporation, PECHINEY, S.A., a)
French corporation, ALCAN RHENALU, a)
French corporation, ALCAN PECHINEY)
CORP., a Texas corporation, PECHINEY)
METALS, LLC, a Delaware limited liability)
company, ALCAN ROLLED PRODUCTS –)
RAVENSWOOD, LLC, a Delaware limited)
liability company,)
)
Defendants.)

**DEFENDANTS' MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

1. Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendants Alcan Inc., Alcan Corp. (Texas), Pechiney, S.A. and Alcan Pechiney Corp. (the "Non-Resident Defendants"), respectfully move to be dismissed from this action for lack of personal jurisdiction.

2. In its Complaint, Alcoa, Inc. ("Alcoa") does not allege that the Non-Resident Defendants conducted activities in Delaware or had contacts with Delaware that would establish personal jurisdiction over the Non-Resident Defendants in Delaware under either the Delaware long-arm statute or the requirements of federal due process.

3. Alcoa could not make allegations sufficient to satisfy the requirements for exercising personal jurisdiction over non-resident defendants under the Delaware long-arm

statute or federal due process because the Non-Resident Defendants have no such contacts with Delaware, as demonstrated by the Affidavits of corporate officers, Roy Millington and Eileen Burns Lerum.

4. The Non-Resident Defendants submit contemporaneously herewith: (i) Defendants' Memorandum of Law in Support of Their Motion to Dismiss for Lack of Personal Jurisdiction; and (ii) the Affidavits of Eileen Burns Lerum and Roy Millington.

WHEREFORE, there being no basis for the exercise of jurisdiction over the Non-Resident Defendants, the Non-Resident Defendants respectfully request that the Court grant their motion to dismiss for lack of personal jurisdiction.

ASHBY & GEDDES

/s/ Steven J. Balick

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Counsel for Defendants

Dated: August 15, 2006

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company, ALCAN ROLLED PRODUCTS –)
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Defendants.)

ORDER

At Wilmington this _____ day of _____, 2006, having considered
Defendants' Motion to Dismiss for Lack of Personal Jurisdiction,

IT IS HEREBY ORDERED that Defendants' motion is GRANTED and Alcan Inc.,
Alcan Corp. (Texas), Pechiney, S.A. and Alcan Pechiney Corp. are dismissed from the lawsuit
for lack of personal jurisdiction.

Chief Judge

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of August, 2006, the attached **DEFENDANTS' MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION** was served upon the below-named counsel of record at the address and in the manner indicated:

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/s/ Steven J. Balick

Steven J. Balick